

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

SEAN JEFFREY THOMPSON,

*

Plaintiff,

*

v.

*

Civil Action No.: **WDQ1:02-CV-1989**

DETECTIVE STEPHEN MARTIN, et al.,

*

Defendants.

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**PLAINTIFF'S MOTION IN LIMINE TO EXCLUDE EVIDENCE OF
HIS PRIOR CRIMINAL CONVICTIONS AND ARREST RECORDS**

Plaintiff, Sean Jeffrey Thompson, by his undersigned counsel, pursuant to Federal Rules of Evidence 402 and 403, hereby moves in limine to exclude evidence of his prior criminal convictions, arrest records, and the Statement of Probable Cause in connection with his March, 2002 arrest, on the grounds, as set forth more fully in the accompanying memorandum of law, that such evidence is not relevant to the issues at trial and, even if relevant, its probative value is substantially outweighed by the danger of unfair prejudice.

Wherefore, for the reasons more fully set forth in the accompanying Memorandum, Plaintiff, Sean Jeffrey Thompson, respectfully requests that the Court issue an order:

A. Granting Plaintiff's Motion in Limine;

B. Excluding any and all evidence, including documents, direct and cross examination questions and testimony of witnesses, relating to the fact that Sean Jeffrey Thompson has been convicted of any crime, his arrest records, and the Statement of Probable Cause in connection with his March, 2002 arrest, as well as to the facts relating to any of those crimes;

C. Prohibiting Defendants from referring during the opening statement and their closing argument to the fact that Mr. Thompson has been convicted of any crime; and

D. Granting such other and further relief as justice and equity require.

Dated: March 3, 2005

_____/s/_____
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